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UBER TECHNOLOGIES, INC.; and RASIER, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

LS 134, an individual

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
a Delaware Corporation; RASIER, LLC,
a Delaware Limited Liability Company;
and DOES 1 through 50, Inclusive.

Defendants.

Case No. 4:23-cv-03811-JSW

**DECLARATION OF RANDALL S. LUSKEY
IN SUPPORT OF DEFENDANTS UBER
TECHNOLOGIES, INC. AND RASIER,
LLC'S MOTION TO TRANSFER VENUE
TO THE NORTHERN DISTRICT OF
ILLINOIS**

Date: December 1, 2023
Time: 9:00 a.m.
Courtroom: 5 – 2nd Floor

Action Filed: August 1, 2023
Trial Date: None Set

DECLARATION OF RANDALL S. LUSKEY

I, Randall S. Luskey, declare pursuant to 28 U.S.C. § 1746:

1. I am an attorney at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, attorneys of record for Defendants Uber Technologies, Inc. and Rasier, LLC (collectively, “Uber”). I respectfully submit this declaration in support of Uber’s Motion to Transfer Venue to the Northern District of Illinois. I know the following facts to be true of my own knowledge, except those matters stated to be based on information and belief, and if called to testify, I could competently do so.

2. The following are the names and addresses of all persons known to be parties and percipient witnesses to any of the matters raised in the pleadings in this action, and the matters upon which they are expected to testify:

a. As alleged in the Complaint, Plaintiff resides in Illinois and is expected to testify as to the events and allegations contained in the Complaint.

b. Because no discovery has been performed, there are likely other witnesses in Illinois that have not been identified who may be necessary witnesses on behalf of either party. These witnesses may include, for example, law enforcement personnel to whom the alleged assault was reported, who may testify as to the events and allegations in Plaintiff’s Complaint; medical personnel and emergency responders who treated Plaintiff after the alleged assault, who may testify as to the damages and injuries Plaintiff allegedly suffered; and individuals with whom Plaintiff and/or the accused driver spoke about the alleged assault, including, for example, Plaintiff’s friend and her boyfriend who Plaintiff was on the way to visit during the ride in which the alleged incident occurred and who encountered Plaintiff soon after the alleged assault, who may testify as to the events and allegations in Plaintiff’s Complaint and/or the damages and injuries Plaintiff allegedly suffered.

3. Attached as **Exhibit 1** is a true and correct copy of the Superior Court of California for the County of San Francisco’s January 23, 2023 Order granting Uber’s Motion to Stay or Dismiss Based on *Forum Non Conveniens* in *In re Uber Rideshare Cases*, CJC-21-005188.

